



Yitzchak Zelman &lt;yzelman@marcuszelman.com&gt;

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**PRA ads. Pollak - Discovery Requests to Plaintiff**

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**Mihalko, Meagan Anne** <Meagan.Mihalko@troutmansanders.com>

Fri, Sep 2, 2016 at 6:48 PM

To: Yitzchak Zelman &lt;yzelman@marcuszelman.com&gt;

Cc: "Anthony, David N." &lt;David.Anthony@troutmansanders.com&gt;, "Genovese, Amanda Lyn" &lt;Amanda.Genovese@troutmansanders.com&gt;

Yitzchak,

Out of an abundance of caution, we are serving the attached discovery on Plaintiffs. After reviewing the Court's Scheduling Order, it states that discovery is to be completed by October 14, 2016. While we did not understand the Court's Order to require the parties to complete class-related discovery, we are serving discovery in the event that is what the Court intended. We suggest contacting the Court next week to seek clarification on the applicability of the October 14, 2016 deadline to class-related discovery. If the Court intended that class-related discovery was to occur after summary judgment, then we would not necessarily need Plaintiffs to respond to the enclosed discovery until that time frame is set by the Court. We will touch base with you early next week regarding the submission of a joint letter to the Court.

Please let me know if you have any questions. Hard copies are also being mailed to you.

Thanks,

Meagan

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